

**FILED**

NOV 20 2020

## UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF OKLAHOMA

Mark C. McCartt, Clerk  
U.S. DISTRICT COURTKEENAN H. MEADORS

Plaintiff(s)

**20CV-595 CVE-JFJ**

Case Number: \_\_\_\_\_

<sup>(2) CHIEF</sup>  
<sup>(3) CHIEF</sup>  
<sup>(5)</sup>  
 (1) <sup>VS.</sup> DEBORAH GIST, MATTHIAS WICKS, TULSA PUBLIC SCHOOLS BOARD OF EDUCATION, TULSA PUBLIC SCHOOLS  
 Defendant(s)

## COMPLAINT - EEOC

Comes now the Plaintiff, KEENAN H. MEADORS and for his/her  
TULSA PUBLIC SCHOOLS BOARD OF EDUCATION CHIEF RUBLER  
DEBORAH GIST, CHIEF MATTHIAS (MATTHEW) WICKS, TULSA PUBLIC SCHOOLS  
 claim against the Defendant(s),  
 states and alleges as follows:

1. This action is brought and jurisdiction lies pursuant to 42 U.S.C. §2000e-5. Venue is proper in this District.

2. Plaintiff is a(n) BLACK MALE who resides at  
 (Race) (Sex)

619 EAST MOHAWK BLVD TULSA, OK 74106  
 (Complete address)

3. The Defendant TULSA PUBLIC SCHOOLS is an employer,  
 employment agency, or labor organization, as defined in 42 U.S.C. §2000e, and is located at  
3027 SOUTH NEW HAVEN AVENUE TULSA OK 74114

(Note: 3a-3f to be used if there is more than one defendant.)

3a. The Defendant \_\_\_\_\_ is an employer,  
 employment agency, or labor organization, as defined in 42 U.S.C. §2000e, and is located at  
 \_\_\_\_\_

3b. The Defendant \_\_\_\_\_ is an employer,  
 employment agency, or labor organization, as defined in 42 U.S.C. §2000e, and is located at  
 \_\_\_\_\_

3c. The Defendant \_\_\_\_\_ is an employer,  
 employment agency, or labor organization, as defined in 42 U.S.C. §2000e, and is located at  
 \_\_\_\_\_

3d. The Defendant \_\_\_\_\_ is an employer,  
 employment agency, or labor organization, as defined in 42 U.S.C. §2000e, and is located at  
 \_\_\_\_\_

*1 Summary  
 Fees pd  
 12/05*

3e. The Defendant \_\_\_\_\_ is an employer, employment agency, or labor organization, as defined in 42 U.S.C. §2000e, and is located at \_\_\_\_\_

3f. The Defendant \_\_\_\_\_ is an employer, employment agency, or labor organization, as defined in 42 U.S.C. §2000e, and is located at \_\_\_\_\_

4. On or about APRIL 23, 2019, defendant(s)  
(Month/day) (Year)

(Specify the unlawful employment practices which you are alleging against the defendant(s), such as: refusal to hire, discharge from employment, harassment in employment, etc.)

DISCHARGE FROM EMPLOYMENT WAS RETALIATORY FROM A COMPLAINT I MADE FEB 2017 INVOLVING CHIEF ROBERT SWAIN AND DEPUTY CHIEF MATTHIAS WICKS CONCERNING INAPPROPRIATE RECEIVED ACTIVITY OF SWAIN AND WICKS WITH 2 DISPATCHERS WHICH FORCED HEAVY UNEQUAL WORK LOAD ON A SINGLE DISPATCHER. I WAS TERMINATED BUT REHIRED UPON APPEAL TO THE BOARD OF EDUCATION MINUS MY SERGEANT STRIPS. I REFUSED AN EMBRACE (HUG) BY DEBRAH GIST AT AN EVENT AT MCLENNAN HIGH

because of (state why defendant(s) discriminated against you, i.e. race, color religion, sex or national origin, etc.)

ON APRIL 23, 2019 I WAS SERVED TERMINATION NOTICE BY FALSE REASON OF REORGANIZATION OF THE POLICE DEPT/SECURITY DEPT. I, THE OLDEST TO APPLY, WAS THE ONLY POLICE OFFICER TO BE REFUSED REHIRE

5. Plaintiff timely filed a written complaint of discrimination with the Equal Employment Opportunity Commission (EEOC) and received a right to sue letter, a copy of which is attached. All conditions precedent to the institution of this lawsuit have been fulfilled.


Wherefore, Plaintiff prays for (state what relief is sought) REHIRE, BACK PAY, PAIN AND

SUPPORTING DAMAGES, LEGAL EXPENSE RETIREMENT BROUGHT TO DATE OF  
REHIRE AND PUNITIVE DAMAGES.

and such other relief as the Court would allow under Title VII of the Civil Rights Act of 1964.

K. M. M. M. M.  
Signature  
619 EAST MOHAWK BLVD,  
Address  
TULSA OK 74106  
City State ZIP  
918 637 0749  
Telephone

EEOC Form 5 (11/09)

<b>CHARGE OF DISCRIMINATION</b> <small>This form is affected by the Privacy Act of 1974. See enclosed Privacy Act Statement and other information before completing this form.</small>		Charge Presented To:      Agency(ies) Charge No(s): <div style="display: flex; justify-content: space-between;"> <div> <input type="checkbox"/> FEPA  <input checked="" type="checkbox"/> EEOC         </div> <div>564-2019-01364</div> </div>	
<b>Oklahoma Attorney General's Office, Office of CR Enforcement</b> and EEOC <small>State or local Agency, if any</small>			
Name (indicate Mr., Ms., Mrs.) <b>Mr. Keenan Meadors</b>		Home Phone (Incl. Area Code) <b>(918) 425-2138</b>	Date of Birth <b>1953</b>
Street Address      City, State and ZIP Code <b>P.O. Box 6394, Tulsa, OK 74148</b>			
Named is the Employer, Labor Organization, Employment Agency, Apprenticeship Committee, or State or Local Government Agency That I Believe Discriminated Against Me or Others. (If more than two, list under PARTICULARS below.)			
Name <b>TULSA PUBLIC SCHOOLS</b>		No Employees, Members <b>15 - 100</b>	Phone No. (Include Area Code) <b>(918) 746-6800</b>
Street Address      City, State and ZIP Code <b>3027 S. NEW HAVEN AVENUE TULSA, OK 74114, Tulsa, OK 74114</b>			
Name 		No Employees, Members 	Phone No. (Include Area Code) 
Street Address      City, State and ZIP Code 			
DISCRIMINATION BASED ON (Check appropriate box(es)) <div style="display: flex; flex-wrap: wrap;"> <div style="width: 50%;"><input type="checkbox"/> RACE</div> <div style="width: 50%;"><input type="checkbox"/> COLOR</div> <div style="width: 50%;"><input checked="" type="checkbox"/> SEX</div> <div style="width: 50%;"><input type="checkbox"/> RELIGION</div> <div style="width: 50%;"><input type="checkbox"/> NATIONAL ORIGIN</div> <div style="width: 50%;"><input checked="" type="checkbox"/> RETALIATION</div> <div style="width: 50%;"><input checked="" type="checkbox"/> AGE</div> <div style="width: 50%;"><input type="checkbox"/> DISABILITY</div> <div style="width: 50%;"><input type="checkbox"/> GENETIC INFORMATION</div> <div style="width: 50%;"><input type="checkbox"/> OTHER (Specify)</div> </div>			DATE(S) DISCRIMINATION TOOK PLACE Earliest      Latest <b>04-23-2019      06-13-2019</b>  <input type="checkbox"/> CONTINUING ACTION
THE PARTICULARS ARE (If additional paper is needed, attach extra sheet(s)) <p><b>I. I was retaliated against in my position of Police Officer for a complaint I made in about February 2017 against my Supervisor at that time Chief of Police Robert Swain and Deputy Chief Matthias Wicks. My complaint was about possible sexual relationships with female Dispatchers my Supervisors had resulting in a single female Dispatcher doing the work alone. I believe that I was retaliated against by Debra Gist, Superintendent because I rejected her embrace when I did not embrace her back.</b></p> <p><b>On about April 23, 2019 I was served notice that all Police Officers and Security Officers were to be terminated and need to reapply for re-employment as part of a reorganization. I reapplied as expected, I was the only Police Officer not rehired. My employment ended on about June 13, 2019. Other younger male and female co-workers were rehired. Other employees hired are not CLEET certified.</b></p>			
I want this charge filed with both the EEOC and the State or local Agency, if any. I will advise the agencies if I change my address or phone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.  I declare under penalty of perjury that the above is true and correct.		NOTARY - When necessary for State and Local Agency Requirements  I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief. SIGNATURE OF COMPLAINANT <div style="text-align: center;">   <b>Keenan Meadors</b>          SUBSCRIBED AND SWORN TO BEFORE ME THIS 02<sup>nd</sup> day of FEBRUARY 2020       </div>	
Date <b>02 07 2020</b>		Charging Party Signature <b>Keenan Meadors</b>	

 2020 FEB 10 AM 10:38  
 OKLAHOMA DEPARTMENT OF REVENUE  
 RECEIVED  
 CIVIL RIGHTS DIVISION

Enclosure with EEOC  
Form 181 (11/16)

**INFORMATION RELATED TO FILING SUIT  
UNDER THE LAWS ENFORCED BY THE EEOC**

*(This information relates to filing suit in Federal or State court under Federal law.  
If you also plan to sue claiming violations of State law, please be aware that time limits and other  
provisions of State law may be shorter or more limited than those described below.)*

**PRIVATE SUIT RIGHTS -- Title VII of the Civil Rights Act, the Americans with Disabilities Act (ADA),  
the Genetic Information Nondiscrimination Act (GINA), or the Age  
Discrimination in Employment Act (ADEA):**

In order to pursue this matter further, you must file a lawsuit against the respondent(s) named in the charge within 90 days of the date you receive this Notice. Therefore, you should keep a record of this date. Once this 90-day period is over, your right to sue based on the charge referred to in this Notice will be lost. If you intend to consult an attorney, you should do so promptly. Give your attorney a copy of this Notice, and its envelope, and tell him or her the date you received it. Furthermore, in order to avoid any question that you did not act in a timely manner, it is prudent that your suit be filed within 90 days of the date this Notice was mailed to you (as indicated where the Notice is signed) or the date of the postmark, if later.

~~Your lawsuit may be filed in U.S. District Court or a State court of competent jurisdiction.~~ (Usually, the appropriate State court is the general civil trial court.) Whether you file in Federal or State court is a matter for you to decide after talking to your attorney. Filing this Notice is not enough. You must file a "complaint" that contains a short statement of the facts of your case which shows that you are entitled to relief. Courts often require that a copy of your charge must be attached to the complaint you file in court. If so, you should remove your birth date from the charge. Some courts will not accept your complaint where the charge includes a date of birth. Your suit may include any matter alleged in the charge or, to the extent permitted by court decisions, matters like or related to the matters alleged in the charge. Generally, suits are brought in the State where the alleged unlawful practice occurred, but in some cases can be brought where relevant employment records are kept, where the employment would have been, or where the respondent has its main office. If you have simple questions, you usually can get answers from the office of the clerk of the court where you are bringing suit, but do not expect that office to write your complaint or make legal strategy decisions for you.

**PRIVATE SUIT RIGHTS -- Equal Pay Act (EPA):**

EPA suits must be filed in court within 2 years (3 years for willful violations) of the alleged EPA underpayment: back pay due for violations that occurred more than 2 years (3 years) before you file suit may not be collectible. For example, if you were underpaid under the EPA for work performed from 7/1/08 to 12/1/08, you should file suit before 7/1/10 – not 12/1/10 – in order to recover unpaid wages due for July 2008. This time limit for filing an EPA suit is separate from the 90-day filing period under Title VII, the ADA, GINA or the ADEA referred to above. Therefore, if you also plan to sue under Title VII, the ADA, GINA or the ADEA, in addition to suing on the EPA claim, suit must be filed within 90 days of this Notice and within the 2- or 3-year EPA back pay recovery period.

**ATTORNEY REPRESENTATION -- Title VII, the ADA or GINA:**

If you cannot afford or have been unable to obtain a lawyer to represent you, the U.S. District Court having jurisdiction in your case may, in limited circumstances, assist you in obtaining a lawyer. Requests for such assistance must be made to the U.S. District Court in the form and manner it requires (you should be prepared to explain in detail your efforts to retain an attorney). Requests should be made well before the end of the 90-day period mentioned above, because such requests do not relieve you of the requirement to bring suit within 90 days.

**ATTORNEY REFERRAL AND EEOC ASSISTANCE -- All Statutes:**

You may contact the EEOC representative shown on your Notice if you need help in finding a lawyer or if you have any questions about your legal rights, including advice on which U.S. District Court can hear your case. If you need to inspect or obtain a copy of information in EEOC's file on the charge, please request it promptly in writing and provide your charge number (as shown on your Notice). While EEOC destroys charge files after a certain time, all charge files are kept for at least 6 months after our last action on the case. Therefore, if you file suit and want to review the charge file, please make your review request within 6 months of this Notice. (Before filing suit, any request should be made within the next 90 days.)

**IF YOU FILE SUIT, PLEASE SEND A COPY OF YOUR COURT COMPLAINT TO THIS OFFICE.**



EEOC Form 161 (11/16)

## U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION

## DISMISSAL AND NOTICE OF RIGHTS

To: Keenan Meadors  
P.O. Box 6394  
Tulsa, OK 74148

From: Oklahoma City Area Office  
215 Dean A. McGee Avenue  
Suite 524  
Oklahoma City, OK 73102



On behalf of person(s) aggrieved whose identity is  
CONFIDENTIAL (29 CFR §1601.7(a))

EEOC Charge No.

EEOC Representative

Telephone No.

564-2019-01364

Marilyn S. Koshlway,  
Investigator

(405) 231-4359

## THE EEOC IS CLOSING ITS FILE ON THIS CHARGE FOR THE FOLLOWING REASON:



The facts alleged in the charge fail to state a claim under any of the statutes enforced by the EEOC.



Your allegations did not involve a disability as defined by the Americans With Disabilities Act.



The Respondent employs less than the required number of employees or is not otherwise covered by the statutes.



Your charge was not timely filed with EEOC; in other words, you waited too long after the date(s) of the alleged discrimination to file your charge



The EEOC issues the following determination: Based upon its investigation, the EEOC is unable to conclude that the information obtained establishes violations of the statutes. This does not certify that the respondent is in compliance with the statutes. No finding is made as to any other issues that might be construed as having been raised by this charge.



The EEOC has adopted the findings of the state or local fair employment practices agency that investigated this charge.



Other (briefly state)

## - NOTICE OF SUIT RIGHTS -

(See the additional information attached to this form.)

**Title VII, the Americans with Disabilities Act, the Genetic Information Nondiscrimination Act, or the Age Discrimination in Employment Act:** This will be the only notice of dismissal and of your right to sue that we will send you. You may file a lawsuit against the respondent(s) under federal law based on this charge in federal or state court. Your lawsuit must be filed **WITHIN 90 DAYS** of your receipt of this notice; or your right to sue based on this charge will be lost. (The time limit for filing suit based on a claim under state law may be different.)

**Equal Pay Act (EPA):** EPA suits must be filed in federal or state court within 2 years (3 years for willful violations) of the alleged EPA underpayment. This means that backpay due for any violations that occurred **more than 2 years (3 years)** before you file suit may not be collectible.

On behalf of the Commission

ADRIAN MCDANIEL

Debra Gist, Director  
U.S. Equal Employment Opportunity  
Commission, c/o ADRIAN MCDANIEL  
6323 CLYDE BLVD., SUITE 100  
OKLAHOMA CITY, OK 73109

8-27-2020

Enclosures(s)

For: Holly . Waldron Cole,  
Area Office Director

(Date Mailed)

cc:

Debra Gist  
Superintendent  
TULSA PUBLIC SCHOOLS  
3027 S. NEW HAVEN AVENUE TULSA, OK 74114  
Tulsa, OK 74114

Lauren Lambricht  
SMOLEN & ROYTMAN, PLLC  
701 South Cincinnati Avenue  
Tulsa, OK 74119

EEOC Form 5 (11/09)

**CHARGE OF DISCRIMINATION**

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Charge Presented To: Agency(ies) Charge No(s):

☐ FEPA☒ EEOC

564-2019-01364

**Oklahoma Attorney General's Office, Office of CR Enforcement**

and EEOC

*State or local Agency, if any*

II. The reason for denial of re-hire by Carlos Lopez, Director of Talent Strategy stating "I can tell you that the decision making process included review of your past job evaluations, job skills and qualifications to perform the work of the new role".

III. I believe that I have been discriminated against due to Retaliation, Sex, Male in violation of Title VII of the Civil Rights Act of 1964, as amended and due to my Age, 65 yrs. in violation of the Age Discrimination in Employment Act of 1967, as amended.

RECEIVED EEOC  
OKLAHOMA CITY AREA OFFICE  
2020 FEB 10 AM 10:38

I want this charge filed with both the EEOC and the State or local Agency, if any. I will advise the agencies if I change my address or phone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.

I declare under penalty of perjury that the above is true and correct.

02 07 2020

Date

Iceanon Meadows

Charging Party Signature

NOTARY – When necessary for State and Local Agency Requirements

I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.

SIGNATURE OF COMPLAINANT

Iceanon Meadows

SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE

(month, day, year) 02 07 2020